

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

UNITED STATES

Plaintiff,

v.

Glushchenko, Eugenii

Defendant.

§ No. CV-19-04678-PHX-SPL (JFM)

§

§

§

§

§

§

§


§

SUPPLEMENTAL DECLARATION OF Jason Ciliberti

I, Jason Ciliberti, hereby declare:

1. I am the Assistant Field Office Director (AFOD) of the Eloy Detention Center (EDC), Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), Phoenix Field Office. My responsibilities as the AFOD include the supervision of the employees working in the detention and removal units at the EDC and monitoring the care of ICE detainees at the EDC.
2. This updated declaration supplements my prior declaration to the court dated July 9, 2019, regarding Eugenii Glushchenko, Axxx xxx 460, a Russian national currently detained at the EDC.
3. ERO has contracted for a special air ambulance charter to effect Mr. Glushchenko's lawful removal from the United States. Due to security concerns the exact date cannot be disclosed, but the removal is expected to occur within the next four weeks. The special air ambulance charter will allow ERO to safely remove Mr. Glushchenko from the United States in his current medical condition as well as address his unwillingness to voluntarily board a commercial removal flight.
4. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge.

Executed July 15, 2019, in Eloy, Arizona.



Jason Ciliberti
Assistant Field Office Director
Phoenix Field Office